IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF TEXAS EL PASO DIVISION

IN RE:

\$
THE GATEWAY VENTURES, LLC,

\$ Case No. 21-30071-hcm

\$ Chapter 7

Debtor.

MOTION FOR CONTINUANCE OF HEARING ON WESTAR INVESTORS GROUP, LLC'S MOTION TO VACATE AMENDED AND RESTATED SPECIAL WARRANTY DEED FILED BY THE DEBTOR (RE: dkt# 502)

TO THE HONORABLE CHRISTOPHER G. BRADLEY, UNITED STATES BANKRUPTCY JUDGE:

COMES NOW WESTAR INVESTORS GROUP, LLC ("Westar"), by and through its attorneys of record, and files this, its Motion for Continuance of Hearing on its Motion to Vacate Amended and Restated Special Warranty Deed Filed by the Debtor, and in support thereof, would respectfully show as follows:

- 1. On August 30, 2023, Westar filed its 29, 2020, Galaway filed its Motion to Vacate Amended and Restated Special Warranty Deed Filed by the Debtor (the "Motion to Vacate") [dkt# 502]. The Motion to Vacate is currently set for hearing on October 26, 2020 at 9:00 a.m.
- 2. Counsel for Westar has been attempting to negotiate a resolution to the Motion to Vacate with the counsel for the Trustee. In an effort to allow the negotiations to continue, Westar has agreed to continue the hearing on its Motion to Vacate to the Court's November 9, 2023 docket.
- 3. Westar would respectfully request the Court to continue the hearing on the Motion to Vacate to the Court's November 9, 2023 docket.

Certificate of Conference

4. Counsel for Westar has conferred with counsel for the Trustee and counsel for Michael Dixson and they have no objection to the relief requested herein.

WHEREFORE, PREMISES CONSIDERED, WESTAR INVESTORS GROUP, LLC respectfully requests the Court to continue the October 26, 2023 hearing on its Motion to Vacate Amended and Restated Special Warranty Deed Filed by the Debtor [dkt #502] to the Court's November 9, 2023 docket, and for such other and further relief to which it shall show itself to be justly entitled.

DATED this <u>Y</u> day of October, 2023.

GORDON DAVIS JOHNSON & SHANE P.C.

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By:

Harrel L. Davis III State Bar No. 05567560 hdavis@eplawyers.com

Attorneys for Westar Investors Group, LLC

CERTIFICATE OF SERVICE

I certify that on the 24 day of October, 2023, a true and correct copy of the above and foregoing was served upon the attached list of parties via electronic means as listed on the Court's ECF noticing system or by regular first-class mail:

Harrel L. Davis

21-30071-cgb Doc#521 Filed 10/24/23 Entered 10/24/23 11:32:31 Main Document Pg 3 of Label Matrix for local noticing The Gateway Ventures, ALC 0542-3

Case 21-30071-cgb

Western District of Texas

El Paso Tue Oct 24 10:12:37 CDT 2023

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21-30071-cgb Doc#521 Filed 10/24/23 Entered 10/24/23 11:32:31 Main Document Pg 4 of Suresh Kumar Texas Attorney General (p) TEXAS COMMISSION ON ENVIRONMENTAL QUALITY c/o Harrel Davis Environmental Protection Division

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The preferred mailing address (p) above has been substituted for the following entity/entities as so specified by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

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Texas Commission on Environmental Qualit Reg. 6 Office Compliance Enforcement 401 E Franklin Ave, Suite 560 El Paso, TX 79901-1212

End of Label Matrix 41 Mailable recipients Bypassed recipients 41 Total